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March 22, 2018

Hon. Robert W. Lehrburger  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *UMB Bank, N.A. v. Sanofi*, No. 15 Civ. 8725 (GBD) (RWL)

Dear Magistrate Judge Lehrburger:

Pursuant to the Court's March 8, 2018 Order (ECF No. 172), enclosed please find three cases supporting Sanofi's position on the privilege issues raised in Plaintiff's letter motion dated March 2, 2018 (ECF No. 170): *Cytec Industries, Inc. v. Allnex (Luxembourg) & Cy S.C.A.*, 2016 WL 3542453 (S.D.N.Y. June 23, 2016); *Lehman Brothers International (Europe) (in administration) v. AG Financial Products, Inc.*, 2016 WL 392709 (N.Y. Sup. Ct. Jan. 11, 2016); and *TC Ravenswood, LLC v. National Union Fire Insurance Company of Pittsburgh Pennsylvania*, 2013 WL 3199817 (S.D.N.Y. June 20, 2013).

Also enclosed, pursuant to the Court's March 16, 2018 Order (ECF No. 174), are copies of the documents identified by Plaintiff for Your Honor's *in camera* review.

We are available at the Court's convenience to answer any questions Your Honor may have.

Respectfully submitted,

/s/ John A. Neuwirth  
John A. Neuwirth

cc: Counsel of Record (w/o documents for *in camera* review)